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PEDRO SANCHEZ

HAKAN YUCESOY, ABDI MAHAMMED,
MOKHTAR TALHA, BRIAN MORRIS, and
PEDRO SANCHEZ, individually and on
behalf of all others similarly situated,

Plaintiffs,

v.

UBER TECHNOLOGIES, INC. and TRAVIS
KALANICK,

Defendants.

CASE NO. 3:15-cv-00262-EMC

**STIPULATION AND [PROPOSED] ORDER
TO EXPEDITE DISCOVERY**

Date: November 24, 2015
Time: 1:30 p.m.
Place: Courtroom 5
Judge: Hon. Edward M. Chen

1 **STIPULATION**

2 Pursuant to Civil Local Rule 7-12, the undersigned counsel of record for Plaintiffs Hakan
 3 Yucesoy, Abdi Mahammed, Mokhtar Talha, Brian Morris, and Pedro Sanchez (“Plaintiffs”) and
 4 Defendants Uber Technologies, Inc. and Travis Kalanick (“Defendants”) (collectively, the “Parties”)
 5 stipulate and agree as follows:

6 WHEREAS, the Court granted the Parties’ stipulation that the deposition of Plaintiff Yucesoy
 7 shall take place on January 8, 2016, in San Francisco, CA, *see* Dkt. 126;

8 WHEREAS, the Court ordered the Parties to “meet and confer and to submit to the Court a
 9 stipulation regarding expedited discovery” in advance of Mr. Yucesoy’s deposition, *see* Dkt. 125 at 2;

10 WHEREAS, the pleadings may not be settled in advance of the January 8, 2016 deposition of
 11 Mr. Yucesoy;

12 WHEREAS, in order to complete “expedited discovery before Mr. Yucesoy’s deposition
 13 takes place” in light of the Court’s order that “Defendants shall depose Mr. Yucesoy on all issues”
 14 but that “Mr. Yucesoy may be subject to recall if reasonably necessary” (Dkt. 374), the Parties are
 15 agreed that (1) Defendants may propound discovery on Mr. Yucesoy on or before November 20,
 16 2015, based on the allegations in the Second Amended Complaint even though some of the claims in
 17 the Second Amended Complaint have been dismissed, and Plaintiffs will respond to any such
 18 discovery within fourteen days of service; and (2) Defendants may serve additional discovery on Mr.
 19 Yucesoy within seven days after Plaintiffs file their Third Amended Complaint, and Plaintiffs will
 20 respond to any such discovery within fourteen days of service.

21 IT IS HEREBY STIPULATED AND AGREED, subject to the Court’s approval, that:

22 (1) Defendants may propound discovery on Mr. Yucesoy based on the allegations in the
 23 Second Amended Complaint by November 20, 2015, and Plaintiffs will respond to any such
 24 discovery within fourteen (14) days of service; and

25 (2) Defendants may propound additional discovery on Mr. Yucesoy within seven (7) days
 26 after Plaintiffs file their Third Amended Complaint, and Plaintiffs will respond to any such discovery
 27 within fourteen (14) days of service.

28

1 **IT IS SO STIPULATED**

2
3 Dated: November 17, 2015

GIBSON, DUNN & CRUTCHER LLP

5 By: _____ /s/ Theane D. Evangelis
6 Theane D. Evangelis

7 Attorneys for Defendants UBER
8 TECHNOLOGIES, INC. and TRAVIS
9 KALANICK

10 Dated: November 17, 2015

LICHTEN & LISS-RIORDAN, P.C.

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12 By: _____ /s/ Shannon Liss-Riordan
13 Shannon Liss-Riordan

14 Attorney for Plaintiffs HAKAN YUCESOY, ABDI
15 MAHAMMED, MOKHTAR TALHA, BRIAN
16 MORRIS, and PEDRO SANCHEZ

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19 [PROPOSED] ORDER
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21 PURSUANT TO STIPULATION, IT IS SO ORDERED.

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23 Dated: 11/20, 2015



ECF ATTESTATION

I, Dhananjay S. Mantripragada, hereby attest that concurrence in the filing of this document has been obtained from Theane D. Evangelis and Shannon Liss-Riordan.

By: /s/ Dhananjay S. Manthripragada
Dhananjay S. Manthripragada